GVNW

December 5, 1997 VIA FEDERAL EXPRESS

Office of the Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, DC 20554

Re: No. CCD 92-237; In the Matter of Administration of the North American Numbering Plan, Carrier Identification Codes (CIC's)

Enclosed for filing in the above captioned matter are an original and four (4) copies of a Petition of Eleven (11) Iowa Local Exchange Telephone Companies for Waiver of the January 1, 1998 Implementation Date for 4-Digit CIC. We trust that the enclosed will be found in order for filing and grant.

Should you require any further information, or have any questions regarding this filing, please call my office directly at (719) 594-5800.

Sincerely,

Bob Schoonmaker
Vice-President

Enclosures
cc: Service List

GVNW INC./MANAGEMENT
2270 La Montana Way (80918) P.O. Box 25969 (80936) Colorado Springs, CO (719) 594-5800 FAX: (719) 599-0968

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
Administration of the North American Numbering Plan, Carrier Identification Codes (CICs)	)	CC Docket No. 92-237

PETITION OF ELEVEN (11) IOWA LOCAL EXCHANGE TELEPHONE COMPANIES FOR WAIVER OF THE JANUARY 1, 1998 IMPLEMENTATION DATE FOR 4-DIGIT CIC

GVNW, Inc.
2270 La Montana Way
Colorado Springs, Colorado 80918

Date Submitted: December 8, 1997

TABLE OF CONTENTS

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
Administration of the North American Numbering Plan, Carrier Identification Codes (CICs)	)	CC Docket No. 92-237

PETITION OF ELEVEN (11) IOWA LOCAL EXCHANGE TELEPHONE COMPANIES FOR WAIVER OF THE JANUARY 1, 1998 IMPLEMENTATION DATE FOR 4-DIGIT CIC

I. Introduction

Several Iowa local exchange telephone companies[1], by their consultant, and pursuant to the Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, CC Docket No. 92-237, (hereafter "the Order"), hereby request a temporary waiver of the requirement that all Local Exchange Carriers ("LECs") that are equal access complete upgrades to their switches to recognize four digit CICs by January 1, 1998.

In the Order, the FCC reaffirmed its requirement that LECs that provide equal access must convert their switches to accept four digit CICs by January 1, 1998. The FCC also extended the permissive period to June 30, 1998 during which three and four digit CICs would continue to be accepted.

[1] Breda Telephone Company, Coon Valley Cooperative Telephone Association, Inc., Defiance Telephone Company, Hawkeye Telephone Company, Jordan-Soldier Valley Telephone Company, Lehigh Valley Co-op Telephone Association, Lone Rock Cooperative Telephone Company, Manilla Telephone Company, Norway Rural Telephone Company, Prairie Telephone Company, and Radcliffe Telephone Company.

Paragraph 20 of the Order reads, "First, we determine that LEC end office switches must be upgraded to accept four-digit CICs by January 1, 1998. Second, we determine that the transition during which use of both three-digit CICs and five-digit CACs may continue will end on June 30, 1998, rather than on January 1, 1998."

Further, paragraph 24 states, "If we receive a complaint of LEC noncompliance, infeasibility with that deadline will not relieve a defendant LEC of liability under section 208 of the Commission's rules. A LEC that determines that it will not meet the January 1, 1998 conversion deadline must seek relief from the Commission prior to that date."

In compliance with the FCC's Order on Reconsideration, specifically at paragraph 24, the Iowa companies are seeking relief of the FCC's conversion deadline of January 1, 1998, by this request for wavier. The Iowa Companies will identify special circumstances that warrant a deviation from the Order and that a wavier will serve the public interest. They will show good cause that a waiver of the Commission's Order is necessary and appropriate as well as in the public interest.

II. Background

Each of the Iowa Company petitioners implemented equal access by participating in centralized equal access service provided by Iowa Network Services (INS). Iowa Network Service's centralized equal access function provides presubscription and equal access capabilities through a centralized switching system rather than through provisioning in the end office switch. Thus, the software capabilities for providing equal access are normally contained in the INS switch rather than in the petitioners end office switches. Centralized equal access allowed these small rural local exchange companies (Iowa LECs) to provide equal access at an earlier time than in many rural areas. In most

cases, as additional network requirements have arisen since implementation of centralized equal access, the petitioners have been able to provide these services through the INS switch and have not been required to invest in costly upgrades to their individual end office switches.

The petitioners generally invested in digital switching technology at a point in time earlier than otherwise would have occurred, bringing the benefits of digital technology to their rural customers. These investments were also generally made well before switch manufacturers made 4-digit CIC capabilities available. The petitioners have been able to provide satisfactory service through INS without costly upgrades or switch replacements, thus helping to reduce the cost of serving their rural customers. Through INS, the petitioners have been able to provide equal access presubscription to carriers who have been assigned 4-digit CIC codes. This has been accomplished by using the translations in their switches and the INS switch to convert the 4-digit code to a shorter code for use between the two switches. However, each of the petitioners now finds itself in the position of not being able to completely comply with the Commission's ordered January 1, 1998 4-digit CIC/7-digit CAC requirement, primarily because their switches cannot outpulse the necessary digits to transmit a 7-digit CAC.

Because of the unique relationship between the petitioners and their centralized equal access provider, INS, these LECs relied heavily on communications with INS regarding their capabilities for meeting the 4-digit CIC requirement. Communications, both written and verbal, including communication subsequent to the Second Report and Order in April led them to believe they could meet the 4-digit CIC requirement through INS without upgrading or replacing their switches. For example, the April 4, 1997 INS

memo to its members (see Attachment I) indicated that the Nortel DMS-10 switches with a generic of 402.53 or higher would meet the requirement and that other switches had "some issues that need to be addressed." For most of the petitioning companies, it was not until they received a November 4, 1997 FAX message from INS (see Attachment II), indicating that if they did not have SS7 capability that there would be a problem, that they realized they might not have the capability to meet the FCC's 4-digit CIC requirement, a fact which has now been substantiated.

III. A Waiver of the Commission Rules is Necessary and in the Public Interest

The companies have taken immediate action to begin the process of achieving compliance with the Commission's requirements upon learning from INS that they could not achieve compliance without changes to their end office switches. Individual company situations vary and will be specifically described hereafter. They range from situations where replacement switches are currently being installed, but will not be available by January 1, 1998, where replacements were planned for 1998 and plans are being formulated to move those installations forward to as early in the year as possible, to companies who are in the process of getting bids from switch vendors for either generic upgrades or switch replacements. In most cases, the companies will face considerable expenditures of funds in the next few months for the sole purpose of complying with the FCC's order. Without that requirement, they would have been able to provide adequate service to their rural customers for as long as the next three to five years without making these expenditures. The chart below summarizes the current cost estimates of the petitioners to meet the 4-digit CIC requirement.

Company	# of Access Lines	# of Exchanges	Costs Upgrade/Switch Replace
Breda	792	2	Not Available
Coon Valley	454	1	$235,000
Defiance	252	1	$250,000
Hawkeye	485	1	Not Available
Jordan-Soldier	337	1	Not Available
Lehigh	1894	4	Not Applicable
Lone Rock	288	1	Not Available
Manilla	571	1	$250,000
Norway	653	1	$540,000
Prairie	715	2	Not Available
Radcliffe	515	1	Not Available

Each, however, is making plans to comply with the requirement as quickly as possible, particularly in order to be able to fully meet the requirement prior to June 30, 1998. In view of the substantial expenditures that will need to be made to serve a relatively small number of subscribers, failing to grant a waiver request would not benefit the public. The companies are moving forward to implement the FCC requirements as quickly as is technically feasible. The end user customers are being, and have been provided, equal access and presubscription for several years. They have and will be able to continue to choose carriers with four-digit CIC codes for presubscription purposes. During the interim period until the full requirements can be met, only casual dialing needs cannot be fulfilled. As is shown in the accompanying individual company data, the companies serve relatively few pay telephone locations and even fewer hotels and motels where casual dialing is more likely to occur. The companies therefore request that they be granted the additional time in order to fully comply with the FCC's timing requirements.

Specified hereafter, in a separate section for each company, are details of the companies' serving areas, exchanges where waivers are needed, access lines, current switch types and software generics. Also included, are the companies' plans for meeting the 4-digit CIC requirement and the specific waiver date being requested.

IV. Breda Telephone Corporation

Breda Telephone Company, ("Breda") serves three exchanges and just over 1,100 access lines in Iowa. Two of these exchanges, Breda and Lidderdale, will not be capable of meeting the 4-digit CIC requirements. The Breda exchange serves approximately 588 access lines, three payphones and no hotel/motels and is served by a Stromberg-Carlson DCO with the software generic 14. The Lidderdale exchange serves approximately 204 access lines, one payphone and no hotel/motels. Lidderdale is served by a Stromberg-Carlson RLS, with the software generic 14. Both switches were installed in 1986.

Due to the recent information received from INS that Breda cannot accommodate the CIC requirements with its existing switching configuration. Breda has initiated an interconnection agreement with an affiliated competitive local exchange company (CLEC) to act as a host switch for various features and functions to include the capability of the 4-digit CIC. It is anticipated that the interconnection will be operational by June 30, 1998. Breda will make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Breda respectfully requests a waiver until June 30, 1998.

V. Coon Valley Cooperative Telephone Association, Inc.

Coon Valley Cooperative Telephone Association, Inc., ("Coon Valley"), serves two exchanges, one of which (Menlo) will not be capable of meeting the 4-digit CIC requirements. The Menlo exchange serves 454 access lines, five payphones and no hotels/motels. Menlo is served by a Stromberg/Carlson with a software generic of 14.1. This switch was installed in 1987.

Coon Valley was planning to upgrade the 14.1 software generic to a 21 software generic in the third quarter of 1998. The estimated cost to complete the upgrade is $235,000. Coon Valley intends to expedite the installation of the upgrade to meet with the FCC's required effective date for the end of the permissive period. The Company will make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Coon Valley respectfully requests a waiver until June 30, 1998.

VI. Defiance Telephone Company

Defiance Telephone Company serves one exchange ("Defiance"), which provisions services for approximately 252 access lines, one payphone and no hotel/motel lines. The exchange is currently served by a Nortel DMS 10 with the generic software version 305.10 which was installed in 1988.

Due to the recent information received from INS that Defiance cannot accommodate the four-digit CIC and seven-digit CAC with its existing switch. Defiance will have to replace the existing switch. Defiance is currently negotiating with Nortel for a switch replacement. The estimated cost is $250,000. Defiance is seeking delivery and installation dates that will meet with the FCC's required effective date for the end of the permissive period. Defiance's intent is to make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Defiance respectfully requests a waiver until June 30, 1998.

VII. Hawkeye Telephone Company

Hawkeye Telephone Company serves one exchange, Hawkeye, which provisions services for approximately 485 access lines, one payphone and no hotel/motel lines. The exchange is currently served by a Nortel DMS 10 with the software generic 402.53. This switch was installed December of 1988.

In order to comply with the FCC's Order, Hawkeye will have to upgrade the generic software so as to accommodate the four digit-CIC and seven digit-CAC. Due to the recent information received from INS that Hawkeye cannot accommodate these requirements with its existing software generic, Hawkeye is expeditiously working with the manufacturer to estimate the costs and timing of the software upgrade. In addition, Hawkeye is seeking delivery and installation dates that will meet the FCC's required effective date for the end of the permissive period.

Hawkeye will make every effort to ensure it is able to comply with the FCC's June 30 , 1998 deadline. Based on the aforementioned information, Hawkeye respectfully requests a waiver until June 30, 1998.

VIII. Jordan-Soldier Valley Telephone Company

Jordan-Soldier Telephone Company ("Jordan-Soldier") serves one exchange, Soldier, which provisions services for approximately 337 access lines, one payphone and no hotel/motel lines. The exchange is currently served by a Nortel DMS 10 with the software generic 208.32. This switch was installed June of 1983.

Due to the recent information received from INS that Jordan-Soldier cannot accommodate the CIC requirements with its existing switching configuration. Jordan-Soldier has initiated an interconnection agreement with a neighboring local exchange company to act as a host switch for various features and functions to include the capability of the 4-digit CIC. It is anticipated that the interconnection will be operational by June 30, 1998. Jordan-Soldier will make effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Jordan-Soldier respectfully requests a waiver until June 30, 1998.

IX. Lehigh Valley Co-op Telephone Association

Lehigh Valley Co-op Telephone Association ("Lehigh"), serves four exchanges for a total of 1894 access lines. The following provides information pertaining to the quantity of access lines by exchange:

Exchange Name	# of Access Lines	# of Payphones	# of Hotels, Motels
Callender	373	0	0
Dayton	696	6	0
Harcourt	240	1	0
Lehigh	585	3	0
TOTAL	1894	10	0

With regard to the current switch information, the following table provides details by exchange of the switch type, software generics and original installation date.

Exchange Name	Switch Vendor & Type	Current Installed Generic	Switch & Generic Install Date
Callender	Nortel DMS 10M	302.7	
Dayton	Nortel DMS 10M	302.7	
Harcourt	Nortel DMS 10M	302.7	
Lehigh	Nortel DMS 10M	302.7	

Lehigh had anticipated having new switches installed and operational by December 1997. However, due to various missed scheduled dates in the installation, the switches will not be complete and operational until February 1, 1998. Based on the aforementioned information, and to allow for any further slippage in the installation schedule, Lehigh respectfully requests a waiver until March 1, 1998.

X. Lone Rock Cooperative Telephone Company

Lone Rock Cooperative Telephone Company ("Lone Rock") serves one exchange, Lone Rock, which provisions services for approximately 288 access lines, two payphones and no hotel/motel lines. The exchange is currently served by a Nortel DMS 10 with the generic software version 402.53 which was installed in 1990.

Lone Rock has initiated action to resolve the issue of noncompliance as a result of the recent information received from INS that it cannot accommodate the CIC requirements with its existing switch software generic. Nortel has informed Lone Rock of its recent resolution plan to develop an auxiliary upgrade to the 402.53 software generic that will provide the means of passing the appropriate 4-digit CIC and 7-digit CAC. Time frames have not been established as to when the upgrade will be available, however, Nortel is aware of the industry implications of not meeting the deadline. The initial cost estimates are between $5,000 to $10,000.

Lone Rock has also established contingency plans in case the response from Nortel is such that it will jeopardize Lone Rock's ability to meet the FCC's deadline. Three alternatives, in order of rank, are as follows: 1) upgrade the switch to a higher software generic should Nortel advise this as a better solution based on the timeline, 2) switch sharing with a neighboring LEC, and 3) a switch replacement. At this juncture in time the economics and timelines for delivery and installation have not yet been determined for the three options. However, it is the intent of Lone Rock to acquire the appropriate data by which to base a decision on its network configuration that will be conducive to the FCC's mandate and to its customer base should Nortel's auxiliary software upgrade be found infeasible.

Lone Rock will pursue all avenues open to it to ensure its compliance with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Lone Rock respectfully requests a waiver until June 30, 1998.

XI. Manilla Telephone Company

Manilla Telephone Company serves one exchange ("Manilla"), which provisions services for approximately 571 access lines, two payphones and no hotel/motel lines. The exchange is currently served by a Nortel DMS 10 with the generic software version 305.10 which was installed in 1991.

Due to the recent information received from INS that Manilla cannot accommodate the four-digit CIC and seven-digit CAC with its existing switch. Manilla will have to replace the existing switch. Manilla is currently negotiating with Nortel for a switch replacement. The estimated cost is $250,000. Manilla is seeking delivery and installation dates that will meet with the FCC's required effective date for the of the permissive period. Manilla's intent is to make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Manilla respectfully requests a waiver until June 30, 1998.

XII. Norway Rural Telephone Company

Norway Rural Telephone Company, ("Norway") serves one exchange, Kanawha, which provisions services for approximately 653 access lines, five payphones and no hotel/motel lines. The exchange is currently served by a Stromberg-Carlson DSO, with the generic software version 14.1. This switch was originally installed on September 17, 1987.

Norway is reviewing a feasible network configuration that will allow it to comply with the FCC's requirement and well as provide for future demands of its customers. The proposed configuration calls for Norway to replace the current switch with a remote switch whose host would reside with another telephone company. In addition, it would require burying fiber from Kanawha to the host switch's facility meet point. The approximate cost of the switch replacement is $340,000 and $200,000 for the fiber construction. Should this configuration not be feasible, Norway is prepared to lease a Nortel DMS 10 from another company at a cost of $2,500 per month and an installation cost of $40,000 to ensure it meets with the FCC's requirement.

Norway will make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Norway respectfully requests a waiver until June 30, 1998.

XIII. Prairie Telephone Company

Prairie Telephone Company, ("Prairie") serves three exchanges and just over 1,000 access lines in Iowa. Two of these exchanges, Yale and Farragut, will not be capable of meeting the 4-digit CIC requirements. The Yale exchange serves approximately 323 access lines, one payphone and no hotel/motels and is served by a Nortel DMS 10M with the software generic 305. The Farragut exchange serves approximately 392 access lines, two payphones and no hotel/motels. Farragut is served by a Nortel DMS 10M, with the software generic 305. Both switches were installed in 1991.

Prior to the FCC's release of its April Order, Prairie had plans to reconfigure its network in 1998. In late April of this year, Prairie initiated contacts to neighboring LECs to establish interconnection plans that would utilize a host switches of two neighboring LECs. This would provide updated features and functions for its customer base as well as include the 4-digit CIC capability. The interconnection agreement is currently being negotiated and will be expedited as necessary. Prairie does not foresee any problems with the negotiation and anticipates being able to comply with the FCC's required effective date for the end of the permissive period. Prairie will make effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Prairie respectfully requests a waiver until June 30, 1998.

XIV. Radcliffe Telephone Company

Radcliffe Telephone Company serves one exchange, Radcliffe, which provisions services for approximately 515 access lines, two payphones and no hotel/motel lines. The exchange is currently served by a Nortel DMS 10 with the generic software version 402.53.

Radcliffe had planned on upgrading its switch in the last quarter of 1998 to a software generic 410. In April 1997, Radcliffe was notified by INS that the 402.53 generic could accommodate the four-digit CIC and seven digit CAC. On November 4, 1997, Radcliffe was notified by INS that the switch could not accommodate these requirements. In order to comply with the FCC's Order, Radcliffe has entered into negotiations with Nortel for an interim software generic upgrade to a 406 generic, which would not impact the planned 410 upgrade. Radcliffe anticipates being able to make the change by June 30, 1998 and will make every effort to ensure it is able to comply with the FCC's June 30, 1998 deadline. Based on the aforementioned information, Radcliffe respectfully requests a waiver until June 30, 1998.

XV. Conclusion

Each of the petitioners is actively pursuing remedies to meet the FCC's requirement as soon as possible. As demonstrated in the individual descriptions and certifications, each company has taken immediate action to remedy its situation in order to meet with the FCC's timing requirements. Grant of the instant petition will serve the public interest and will allow the companies to complete their network upgrades and/or switch replacements by the FCC's required effective date for the permissive period. The Iowa companies submit that the public interest will be better served by a waiver of the December 31, 1997 date and that grant of this petition would be consistent with the policies underlying these rules. Good cause having been shown, the Iowa Companies respectfully request the Commission grant the petition.

Robert C. Schoonmaker
Vice President, GVNW Inc./Management

12/5/97
Date

Date: 4-4-97

To: DMS-10 Users

From: Mike Haskins

Subject: 10xxx and 101xxxx Issues

At the recent DMS-10 users meeting, I discussed some current and future situations arising with the DMS-10 product when customers dial 10xxx and 101xxxx access codes to carriers.

Firstly, if you are a SS7 compliant end office, we have written the translations to take advantage of the carrier data tables in overlay EQA. You will now be able to add carriers to your switch without doing the extremely difficult and potentially dangerous prefix translator changes, which we have for the most part either downloaded into the end offices or provided the translations necessary on a disk. These translations allow your customer to send 10xxx and 101xxxx dial patterns via the SS7 format. This does not apply for coin type of traffic that will have to remain in the MF format.

We are setting up a procedure that will both allow you to be informed of new carrier activity as well as document the activation in your end offices. We envision this to be on a fax basis that you will need to send back to us informing us that you have made the translations changes and performed any required testing or fax back to us requesting INS to perform the changes necessary. We will continue to offer this translation work free of charge.

We have the translations in place in the tandem switches and will be contacting you in the near future to coordinate the activity.

Secondly, if your DMS-10 is of an older vintage, any generic prior to 402.53, (our research shows this is when NTI expanded the outpulsing capability), your switches have some issues that need to be addressed:

In 1988, we developed a 10 XXX strategy that would allow the DMS-10's to outpulse the 10 XXX access codes. The DMS-10's at that time (pre 402.53 generic) could only outpulse 15 digits and could not outpulse the digits necessary to complete dialing and allow for the 10 XXX equal access dialing plans. To accommodate this dialing plan, we developed a "psuedo code" plan that compressed the outpulsed digits, ie, 10225 1+10 was outpulsed as 251 1+10 that worked within the 15 digit limitation. This strategy was also limited for how many carriers it would support. Who would have thought that you would be so successful at attracting as many carriers as you have been. Now, with the carriers ordering 3 and 4 digit CIC codes at a much faster rate, the psuedo codes will soon be exhausted. Another problem is that the when the carriers order a 4 digit CIC code, the dialing pattern for it is 101 XXXX which there is no way to compress the digits into 15 digits (14 with start marks).

What does this mean? It means that you need to carefully consider your upgrade plans. On the good side it is an important reason for you to upgrade. On the bad side, you need to upgrade soon or consider other options. When a carrier orders 101 XXXX access to your exchanges, the request needs to be legally honored. Does this mean tomorrow? No, but it doesn't mean we have forever to address the issue either.

When an interexchange carrier orders access to the INS network we tell them it usually takes around 90 days to get the 10 XXX/ 101 XXXX codes in place and tested in the end offices. Some of the carriers are used to working in Bell Operating area (RBOC'S) and can get 10 XXX/ 101 XXXX by ordering FGB access which for some reason is easier to provide than normal 1+ FGD access. They send out marketing materials asking the customers to dial the access codes and send faxes to you asking you to make test calls. On your network, it is easier to get the premium access first (FGD 1+) but more time consuming to get the secondary grade service. Imagine that!!

I know that this is a difficult topic to discuss with you but we felt that you deserved to know what was going on and to give you as much time as possible to consider your options.

If you have any questions or comments ,please feel free to contact me at 830-0441 to discuss.

Sincerely,

Mike

Mike Haskins